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*Attorneys for Defendants  
Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRENNNA SCHRADER, an individual, on behalf of herself and all others similarly situated,

Plaintiff,

VS.

STEPHEN ALAN WYNN; an individual;  
MAURICE WOODEN, an individual, WYNN  
LAS VEGAS, LLC dba WYNN LAS VEGAS  
a Nevada Limited Liability, WYNN  
RESORTS, LTD, a Nevada Limited Liability  
Company; and DOES 1-20, inclusive; ROE  
CORPORATIONS 1-20, inclusive,

## Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND  
DEADLINE FOR ALL DEFENDANTS  
TO FILE THEIR REPLIES TO:**

**(1) PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT WYNN  
LAS VEGAS, LLC'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT,  
DEFENDANT STEPHEN ALAN  
WYNN'S MOTION TO DISMISS, AND  
DEFENDANT MAURICE WOODEN'S  
MOTION FOR A MORE DEFINITE  
STATEMENT (ECF NO. 54); AND**

**(2) PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT WYNN  
RESORTS, LTD.'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT  
(ECF NO. 55)**

**(THIRD REQUEST)**

1           IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”),  
 2 through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC (“WLV”)  
 3 and Wynn Resorts, Ltd. (“WRL”), through their counsel Jackson Lewis P.C., Defendant Stephen  
 4 Alan Wynn (“Mr. Wynn”), through his counsel Peterson Baker, PLLC, and Defendant Maurice  
 5 Wooden (“Mr. Wooden”), by and through his counsel Kennedy & Couvillier, that all Defendants  
 6 shall have a 14-day extension up to and including June 19, 2020, in which to file replies to Plaintiffs’  
 7 Response in Opposition to Defendant Wynn Las Vegas, LLC’s Motion to Dismiss Plaintiff’s  
 8 Complaint, Defendant Stephen Alan Wynn’s Motion to Dismiss, and Defendant Maurice Wooden’s  
 9 Motion for a More Definite Statement (ECF No. 54); and Plaintiff’s Response in Opposition to  
 10 Defendant Wynn Resorts, Ltd.’s Motion to Dismiss Plaintiff’s Complaint (ECF No. 55).

11           This Stipulation is submitted and based upon the following:

12           1.       On March 6, 2020, Defendant WLV filed a Motion to Dismiss (ECF No. 35) to  
 13 which Defendant WRL filed a Joinder (ECF No. 37); Defendant WRL filed a Motion to Dismiss  
 14 (ECF No. 36); Mr. Wynn filed a Motion to Dismiss (ECF No. 39); and Mr. Wooden filed a Motion  
 15 for a More Definite Statement (ECF No. 33).

16           2.       On April 28, 2020, the parties stipulated that Plaintiff would file her response to  
 17 Defendants’ Motions by May 8, 2020, and Defendants would file their replies by May 22, 2020.  
 18 ECF No. 50. The Court granted the stipulation on April 29, 2020. ECF No. 51.

19           3.       On May 18, 2020, the parties stipulated to allow Defendants to file their replies by  
 20 June 5, 2020. ECF No. 58. The Court granted the stipulation on May 22, 2020. ECF No. 59.

21           4.       Since the parties’ last stipulation, Defendants determined they need additional time  
 22 to prepare their replies. In particular, Defendants WRL and WLV are actively engaged in  
 23 preparations to resume business operations, with WLV anticipating reopening the Wynn Las Vegas  
 24 and Encore Las Vegas hotel and casino properties to the public on June 4, 2020. Further, the  
 25 undersigned counsel for WRL and WLV are preparing for and involved in two arbitration hearings  
 26 taking place over the next few weeks which at the time of the parties’ prior stipulation did not  
 27 appear likely to proceed due to the ongoing COVID-19 pandemic. Collectively, these events are  
 28 impeding counsel’s ability to complete the replies by the current deadline. As such, the parties

1 respectfully request the Court grant this instant Stipulation and allow all Defendants an additional  
2 14 days up to and including June 19, 2020 to file their replies to Plaintiff's responses.

3       5. This is third request for an extension of time for Defendants to file their replies to  
4 Plaintiff's responses.

5       6. This request is made in good faith and not for the purpose of delay.

6       7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed  
7 as waiving any claim and/or defense held by any party.

8              Dated this 3<sup>rd</sup> day of June, 2020.

9              RICHARD HARRIS LAW FIRM

10             \_\_\_\_\_  
11             /s/ *Burke Huber*  
12             Richard Harris, Bar No. 505  
13             Burke Huber, Bar No. 10902  
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16             *Attorney for Plaintiff*  
17             Brenna Schrader

9              JACKSON LEWIS P.C.

10             \_\_\_\_\_  
11             /s/ *Deverie J. Christensen*  
12             Deverie J. Christensen, Bar No. 6596  
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17             *Attorneys for Defendants Wynn Las Vegas,*  
18             *LLC and Wynn Resorts, Ltd.*

15              KENNEDY & COUVILLIER

16             \_\_\_\_\_  
17             /s/ *Maximiliano Couvillier*  
18             Maximiliano D. Couvillier, Bar No. 7661  
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21             *Attorney for Defendant*  
22             Maurice Wooden

15              PETERSON BAKER, PLLC

16             \_\_\_\_\_  
17             /s/ *Tamara Beatty Peterson*  
18             Nikki Baker, Bar No. 6562  
19             Tamara Beatty Peterson, Bar No. 5218  
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22             *Attorney for Defendant*  
23             Stephen Alan Wynn

21              **ORDER**

22              IT IS SO ORDERED:

23              \_\_\_\_\_  
24              *James C. Mahan*  
25              \_\_\_\_\_  
26              United States District Court Judge

27              Dated: June 3, 2020